

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

PETER ALLEN, et al.,

*Plaintiffs,*

-against-

KOENIGSMANN, et al.,

*Defendants.*

---

**DEFENDANT MOORES’  
ANSWER TO SECOND  
AMENDED COMPLAINT AND  
SUPPLEMENTAL CLASS  
ACTION COMPLAINT**

19-cv-8173 (LAP)

Defendant Dr. Carol A. Moores (“Dr. Moores”) by and through her attorney, Whiteman Osterman & Hanna LLP, Answers Plaintiffs’ Second Amended and Supplemental Class Action Complaint (“the Complaint”) and responds as follows:

**Preliminary Statement**

Dr. Moores denies any allegations of wrongdoing contained in the Preliminary Statement.

**Jurisdiction and Venue**

1. The allegations in Paragraph 1 of the Complaint are legal conclusions to which no response is required. To the extent that a response is required, Dr. Moores denies all allegations of wrongdoing.

2. The allegations in Paragraph 2 of the Complaint are legal conclusions to which no response is required. To the extent that a response is required, Dr. Moores denies all allegations of wrongdoing.

3. The allegations in Paragraph 3 of the Complaint are legal conclusions to which no response is required. To the extent that a response is required, Dr. Moores denies all allegations of wrongdoing.

**Jury Demand**

No response is required.

**The Parties**

4. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the Complaint.

5. Admits the allegations in Paragraph 5 of the Complaint.

6. Admits the allegations in Paragraph 6 of the Complaint.

7. Denies the accuracy of the characterizations alleged in Paragraph 7 of the Complaint.

8. Denies the accuracy of the characterization alleged in Paragraph 8 of the Complaint.

9. Denies knowledge and information sufficient to form a belief as to the truth of the allegations in Paragraph 9 of the Complaint.

10. Denies the allegations in Paragraph 10 of the Complaint.

11. Admits the allegations in Paragraph 11 of the Complaint.

12. Admits the allegations in Paragraph 12 of the Complaint.

[Unnumbered] Admits the allegations in the Unnumbered Paragraph referring to Paula Bozer

13. Admits the allegations in Paragraph 13 of the Complaint.

14. Admits the allegations in Paragraph 14 of the Complaint.

15. Admits the allegations in Paragraph 15 of the Complaint.

16. Admits the allegations in Paragraph 16 of the Complaint.
17. Admits the allegations in Paragraph 17 of the Complaint.
18. Admits the allegations in Paragraph 18 of the Complaint.
19. Admits the allegations in Paragraph 19 of the Complaint.
20. Admits the allegations in Paragraph 20 of the Complaint.
21. Admits the allegations in Paragraph 21 of the Complaint.
22. Admits the allegations in Paragraph 22 of the Complaint.
23. Admits the allegations in Paragraph 23 of the Complaint.
24. Admits the allegations in Paragraph 24 of the Complaint.
25. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 25 of the Complaint.
26. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 26 of the Complaint.
27. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 27 of the Complaint.
28. Denies the accuracy of the characterizations alleged in in Paragraph 28 of the Complaint.
29. Denies the accuracy of the characterizations alleged in Paragraph 29 of the Complaint.

## **I. FACTUAL HISTORY – HOW HEALTH CARE IS ADMINISTERED**

### **The Role of the Chief Medical Officer (“CMO”)**

30. Denies the accuracy of the characterizations alleged in Paragraph 30 of the Complaint.

31. Denies the accuracy of the characterizations alleged in Paragraph 31 of the Complaint.

32. Denies the accuracy of the characterizations alleged in Paragraph 32 of the Complaint.

33. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 33 of the Complaint.

34. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 34 of the Complaint.

35. Denies the accuracy of the characterizations alleged in Paragraph 35 of the Complaint.

**The Role of Regional Medical Directors (“RMDs”)**

36. Denies the accuracy and completeness of the characterizations alleged in Paragraph 36 of the Complaint.

37. Denies the accuracy and completeness of the characterizations alleged in Paragraph 37 of the Complaint.

38. Denies the accuracy of the characterizations alleged in Paragraph 38 of the Complaint.

**The Roles of MDs and Mid-Level Clinicians**

39. Denies the accuracy of the characterizations alleged in Paragraph 39 of the Complaint.

40. Denies the accuracy of the characterizations alleged in Paragraph 40 of the Complaint.

41. Denies the accuracy of the characterizations alleged in Paragraph 41 of the Complaint.

42. Denies the accuracy of the characterizations alleged in Paragraph 42 of the Complaint.

43. Denies the accuracy of the characterizations alleged in Paragraph 43 of the Complaint.

44. Denies the accuracy of the characterizations alleged in Paragraph 44 of the Complaint.

45. Denies the accuracy of the characterizations alleged in Paragraph 45 of the Complaint.

46. Denies the accuracy of the characterizations alleged in Paragraph 46 of the Complaint.

47. Denies the accuracy of the characterizations alleged in Paragraph 47 of the Complaint.

48. Denies the accuracy of the characterizations alleged in Paragraph 48 of the Complaint.

49. Denies the accuracy of the characterizations alleged in Paragraph 49 of the Complaint.

50. Denies the accuracy of the characterizations alleged in Paragraph 50 of the Complaint.

51. Denies the accuracy of the characterizations alleged in Paragraph 51 of the Complaint.

52. Denies the accuracy of the characterizations alleged in Paragraph 52 of the Complaint.

**The Role of Consultants and Specialty Medical Providers**

53. Denies the accuracy of the characterizations alleged in Paragraph 53 of the Complaint.

54. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 54 of the Complaint.

55. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 55 of the Complaint.

56. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56 of the Complaint.

57. Denies the accuracy of the characterizations alleged in Paragraph 57 of the Complaint.

58. Denies the accuracy of the characterizations alleged in Paragraph 58 of the Complaint.

59. Denies the accuracy of the characterizations alleged in Paragraph 59 of the Complaint.

60. Denies the accuracy of the characterizations alleged in Paragraph 60 of the Complaint.

61. Denies the accuracy of the characterizations alleged in Paragraph 61 of the Complaint.

62. Denies the accuracy of the characterizations alleged in Paragraph 62 of the Complaint.

63. Denies the accuracy of the characterizations alleged in Paragraph 63 of the Complaint.

64. Denies the accuracy of the characterizations alleged in Paragraph 64 of the Complaint.

65. Denies the allegations in Paragraph 65 of the Complaint, and otherwise refer the Court to the referenced policy for a true and accurate statement of its contents.

66. Denies the allegations contained in Paragraph 66 of the Complaint.

**DOCCS' Medical Records Thwart Patient Care**

67. Denies the allegations in Paragraph 67 of the Complaint.

68. Denies the accuracy of the characterizations alleged in Paragraph 68 of the Complaint.

69. Denies the accuracy of the characterizations alleged in Paragraph 69 of the Complaint.

70. Denies the accuracy of the characterizations alleged in Paragraph 70 of the Complaint.

71. Denies the accuracy of the characterizations alleged in Paragraph 71 of the Complaint.

72. Denies the accuracy of the characterizations alleged in Paragraph 72 of the Complaint.

73. Denies the accuracy of the characterizations alleged in Paragraph 73 of the Complaint.

74. Denies the allegations in Paragraph 74 of the Complaint.

75. Denies the general allegations in Paragraph 75 of the Complaint and denies knowledge or information to form a belief as to the truth of the specific allegations regarding Roderick Reyes.

76. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 of the Complaint.

77. Denies the allegations in Paragraph 77 of the Complaint.

78. Denies the allegations in Paragraph 78 of the Complaint.

**Medical Intake at DOCCS**

79. Denies the accuracy of the characterizations alleged in Paragraph 79 of the Complaint.

80. Denies the accuracy of the characterizations alleged in Paragraph 80 of the Complaint.

81. Denies the accuracy of the characterizations alleged in Paragraph 81 of the Complaint.

82. Denies the accuracy of the characterizations alleged in Paragraph 82 of the Complaint.

83. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 83 of the Complaint.

84. Denies the accuracy of the characterizations alleged in Paragraph 84 of the Complaint.

85. Denies the allegations in Paragraph 85 of the Complaint.

86. Denies the allegations in Paragraph 86 of the Complaint.

87. Denies the allegations in Paragraph 87 of the Complaint.



**II. THE MEDICATIONS WITH ABUSE POTENTIAL “MWAP”  
POLICY**

88. Denies the accuracy of the characterizations alleged in Paragraph 88 of the Complaint.

89. Denies the accuracy of the characterizations alleged in Paragraph 89 of the Complaint.

90. Denies the accuracy of the characterizations alleged in Paragraph 90 of the Complaint.

91. Denies the accuracy of the characterizations alleged in Paragraph 91 of the Complaint.

92. Denies the accuracy of the characterizations alleged in Paragraph 92 of the Complaint.

93. Denies the accuracy of the characterizations alleged in Paragraph 93 of the Complaint.

94. Denies the accuracy of the characterizations alleged in Paragraph 94 of the Complaint.

95. Denies the accuracy of the characterizations alleged in Paragraph 95 of the Complaint.

96. Denies the accuracy of the characterizations alleged in Paragraph 96 of the Complaint.

97. Denies the accuracy of the characterizations alleged in Paragraph 97 of the Complaint.

98. Denies the accuracy of the characterizations alleged in Paragraph 98 of the Complaint.

99. Denies the accuracy of the characterizations alleged in Paragraph 99 of the Complaint.

100. Denies the accuracy of the characterizations alleged in Paragraph 100 of the Complaint.

101. Denies the accuracy of the characterizations alleged in Paragraph 101 of the Complaint.

102. Denies the accuracy of the characterizations alleged in Paragraph 102 of the Complaint.

103. Denies the accuracy of the characterizations alleged in Paragraph 103 of the Complaint.

104. Denies the accuracy of the characterizations alleged in Paragraph 104 of the Complaint.

105. Denies the accuracy of the characterizations alleged in Paragraph 105 of the Complaint.

106. Denies the accuracy of the characterizations alleged in Paragraph 106 of the Complaint.

107. Denies the accuracy of the characterizations alleged in Paragraph 107 of the Complaint.

108. Denies the accuracy of the characterizations alleged in Paragraph 108 of the Complaint.

109. Denies the accuracy of the characterizations alleged in Paragraph 109 of the Complaint.

110. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 110 of the Complaint.

111. Denies the accuracy of the characterizations alleged in Paragraph 111 of the Complaint.

112. Denies the accuracy of the characterizations alleged in Paragraph 112 of the Complaint.

113. Denies the accuracy of the characterizations alleged in Paragraph 113 of the Complaint.

114. Denies the accuracy of the characterizations alleged in Paragraph 114 of the Complaint.

115. Denies the accuracy of the characterizations alleged in Paragraph 115 of the Complaint.

116. Denies the allegations in Paragraph 116 of the Complaint, except denies knowledge or information sufficient to form a belief as to truth of the allegation regarding Dr. John Bendheim.

**The MWAP Policy As Implemented Does Not Meet the Standard of Care**

117. Denies the allegations in Paragraph 117 of the Complaint.

118. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 118 of the Complaint.

119. Denies the allegations contained in Paragraph 119 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its content.

120. Denies the allegations contained in Paragraph 120 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

121. Denies the allegations contained in Paragraph 121 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

122. Denies the allegations contained in Paragraph 122 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

123. Denies the allegations contained in Paragraph 123 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

124. Denies the allegations contained in Paragraph 119 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

125. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 125 of the Complaint.

126. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 126 of the Complaint.

127. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 127 of the Complaint.

128. Denies the accuracy of the characterizations alleged in Paragraph 128 of the Complaint.

129. Denies the accuracy of the characterizations alleged in Paragraph 129 of the Complaint.

130. Denies the accuracy of the characterizations alleged in Paragraph 130 of the Complaint.

131. Denies the accuracy of the characterizations alleged in Paragraph 131 of the Complaint.

132. Denies the accuracy of the characterizations alleged in Paragraph 132 of the Complaint.

133. Denies the allegations contained in Paragraph 133 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

134. Denies the allegations contained in Paragraph 134 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

135. Denies the accuracy of the characterizations alleged in Paragraph 135 of the Complaint.

**Policies Before MWAP Policy Implementation**

136. Denies the allegations in Paragraph 136 of the Complaint.

137. Denies the allegations in Paragraph 137 of the Complaint.

138. Denies the accuracy of the characterizations alleged in Paragraph 138 of the Complaint.

139. Denies the allegations in Paragraph 139 of the Complaint.

140. Denies the allegations in Paragraph 140 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

141. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 141 of the Complaint.

142. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 142 of the Complaint.

143. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 143 of the Complaint.

144. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 144 of the Complaint.

145. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 145 of the Complaint.

146. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 146 of the Complaint.

**Development of the MWAP Policy**

147. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 147 of the Complaint.

148. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 148 of the Complaint.

149. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 149 of the Complaint.

150. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 150 of the Complaint.

151. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 151 of the Complaint.

152. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 152 of the Complaint.

153. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 153 of the Complaint.

154. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 154 of the Complaint.

155. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 155 of the Complaint.

156. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 156 of the Complaint.

157. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 157 of the Complaint.

158. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 158 of the Complaint.

159. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 159 of the Complaint.

160. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 160 of the Complaint.

161. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 161 of the Complaint.

162. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 162 of the Complaint.

163. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 163 of the Complaint.

164. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 164 of the Complaint.

165. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 165 of the Complaint.

166. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 166 of the Complaint, and otherwise refer the Court to the referenced document for a true and accurate statement of its contents.

167. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 167 of the Complaint.

168. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 of the Complaint.

169. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169 of the Complaint.

170. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170 of the Complaint.

171. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171 of the Complaint.

172. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172 of the Complaint.

173. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173 of the Complaint.

174. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 174 of the Complaint.

175. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 175 of the Complaint.



176. Denies the accuracy of the characterizations alleged in Paragraph 176 of the Complaint.

177. Denies the accuracy of the characterizations alleged in Paragraph 177 of the Complaint.

178. Denies the accuracy of the characterizations alleged in Paragraph 178 of the Complaint.

179. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 179 of the Complaint.

180. Denies the allegations in Paragraph 180 of the Complaint.

181. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 181 of the Complaint.

182. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 182 of the Complaint.

183. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 183 of the Complaint.

184. Denies the accuracy of the characterizations alleged in Paragraph 184 of the Complaint.

185. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 185 of the Complaint.

186. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 186 of the Complaint.

187. Denies the accuracy of the characterizations alleged in Paragraph 187 of the Complaint.

188. Denies the accuracy of the characterizations alleged in Paragraph 188 of the Complaint.

189. Denies the accuracy of the characterizations alleged in Paragraph 189 of the Complaint.

190. Denies the accuracy of the characterizations alleged in Paragraph 190 of the Complaint.

191. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 191 of the Complaint.

192. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 192 of the Complaint.

193. Denies the allegations in Paragraph 193 of the Complaint.

194. Denies the allegations in Paragraph 194 of the Complaint.

**III.THERE IS NO REDRESS FOR A DOCCS' PATIENT WHEN  
MWAPS ARE DISCONTINUED**

195. Denies the accuracy of the characterizations alleged in Paragraph of the Complaint.

**The Inmate Grievance Program is Unavailable**

196. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196 of the Complaint, and otherwise refer the Court to the referenced statute for a true and accurate statement of its contents.

197. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 198 of the Complaint.

198. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 198 of the Complaint.

199. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 199 of the Complaint.

200. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 200 of the Complaint, and otherwise refer the Court to the referenced regulation for a true and accurate statement of its contents.

201. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 201 of the Complaint, and otherwise refer the Court to the referenced regulation for a true and accurate statement of its contents..

202. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 202 of the Complaint.

203. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 203 of the Complaint.

204. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 204 of the Complaint.

205. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 205 of the Complaint.

206. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 206 of the Complaint.

207. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 207 of the Complaint.

208. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 208 of the Complaint.

209. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 209 of the Complaint.

210. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 210 of the Complaint.

211. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 211 of the Complaint.

212. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 212 of the Complaint.

213. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 213 of the Complaint.

214. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 214 of the Complaint.

215. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 215 of the Complaint.

216. Denies the allegations in Paragraph 216 of the Complaint.

217. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 217 of the Complaint.

218. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 218 of the Complaint.

219. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 219 of the Complaint.

220. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 220 of the Complaint.

221. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 221 of the Complaint.

222. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 222 of the Complaint.

223. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 223 of the Complaint.

224. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 224 of the Complaint.

225. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 225 of the Complaint.

226. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 226 of the Complaint.

**Patient Appeals to the Chief Medical Officer Do Not Work**

227. Denies the accuracy of the characterizations alleged in Paragraph 227 of the Complaint.

228. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 228 of the Complaint.

229. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 229 of the Complaint.

230. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 230 of the Complaint.

231. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 231 of the Complaint.

232. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 232 of the Complaint.

233. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 233 of the Complaint.

234. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 234 of the Complaint.

235. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 235 of the Complaint.

236. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 236 of the Complaint.

237. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 237 of the Complaint.

238. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 238 of the Complaint.

239. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 239 of the Complaint.

240. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 240 of the Complaint.

241. Denies the allegations in Paragraph 241 of the Complaint.

242. Denies the allegations in Paragraph 242 of the Complaint.

**The Commission of Correction Directs Patients to Write the CMO**

243. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 243 of the Complaint.

244. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 244 of the Complaint.

245. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 245 of the Complaint.

246. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 246 of the Complaint.

**Patient Letters NYS Politicians Are Forwarded to CMO**

247. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 247 of the Complaint.

248. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 248 of the Complaint.

**Patient Letters to the Office of Professional Misconduct Are Forwarded to the CMO**

249. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 249 of the Complaint.

250. Denies the allegations in Paragraph 250 of the Complaint.

**Patient Letters to the New York State Department of Health Are Forwarded to the CMO**

251. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 251 of the Complaint.

252. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 252 of the Complaint.

253. Denies the allegations in Paragraph 253 of the Complaint.

254. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 254 of the Complaint.

**Defendants Koeningsmann and Morley Utterly Failed to Respond to Bona Fide**

**Complaints of Patient Suffering**

255. Denies the allegations in Paragraph 255 of the Complaint.

256. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of the Complaint.

257. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 257 of the Complaint.

258. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 258 of the Complaint.

259. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 259 of the Complaint.

260. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 260 of the Complaint.

261. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 261 of the Complaint.

262. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 262 of the Complaint.

263. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 263 of the Complaint.

264. Denies the allegations in Paragraph 264 of the Complaint.



265. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 265 of the Complaint.

266. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 266 of the Complaint.

267. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 267 of the Complaint.

268. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 268 of the Complaint.

269. Denies the allegations in Paragraph 269 of the Complaint.

#### **IV. PLAINTIFFS AND PROPOSED CLASS REPRESENTATIVES**

270. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270 of the Complaint.

271. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 271 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

272. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 272 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

273. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 273 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

274. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 274 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

275. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 275 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

276. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 276 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

277. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 277 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

278. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 278 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

279. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 279 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

280. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 280 of the Complaint.

281. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 281 of the Complaint.

282. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 282 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

283. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 283 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

284. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 284 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

285. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 285 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

286. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 286 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

287. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 287 of the Complaint.

288. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 288 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

289. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 289 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

290. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 290 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

291. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 291 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

292. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 292 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

293. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 293 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

294. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 294 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

295. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 295 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

296. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 296 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

297. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 297 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

298. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 298 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

299. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 299 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

300. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 300 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

301. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 301 of the Complaint.

302. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 302 of the Complaint.

303. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 303 of the Complaint.

304. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 304 of the Complaint.

305. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 305 of the Complaint.

306. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 306 of the Complaint.

307. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 307 of the Complaint.

308. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 308 of the Complaint.

309. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 309 of the Complaint.

310. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 310 of the Complaint.

311. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 311 of the Complaint.

312. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 312 of the Complaint.

313. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 313 of the Complaint.

314. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314 of the Complaint.

315. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 315 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

316. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 316 of the Complaint.

317. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 317 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

318. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 318 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

319. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 319 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

320. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 320 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

321. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321 of the Complaint.

322. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 322 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

323. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 323 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

324. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 326 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

325. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 325 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

326. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 326 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

327. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327 of the Complaint.

328. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 328 of the Complaint.

329. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 329 of the Complaint.

330. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 330 of the Complaint.

331. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 331 of the Complaint.

332. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 332 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

333. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 333 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.



334. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334 of the Complaint.

335. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 335 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

336. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 336 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

337. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 337 of the Complaint.

338. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 338 of the Complaint.

339. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 339 of the Complaint.

340. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 340 of the Complaint.

341. Denies the characterization of the allegations in Paragraph 341.

342. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 342 of the Complaint.

343. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 343 of the Complaint.

344. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344 of the Complaint.

345. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 345 of the Complaint.

346. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 346 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

347. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 347 of the Complaint.

348. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 348 of the Complaint.

349. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 349 of the Complaint.

350. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 350 of the Complaint.

351. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 351 of the Complaint.

352. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 352 of the Complaint.

353. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 353 of the Complaint.

354. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 344 f the Complaint.

355. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 344 of the Complaint.

356. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 356 of the Complaint.

357. Deny the accuracy of the characterizations alleged in Paragraph 357 of the Complaint.

358. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 358 of the Complaint.

359. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 359 of the Complaint.

360. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 360 of the Complaint.

361. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 361 of the Complaint.

362. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 362 of the Complaint.

363. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 363 of the Complaint.

364. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 364 of the Complaint.

365. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 365 of the Complaint.

366. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 366 of the Complaint.

367. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 367 of the Complaint.

368. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 368 of the Complaint.

369. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 369 of the Complaint.

370. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 370 of the Complaint.

371. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 371 of the Complaint.

372. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 372 of the Complaint.

373. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 373 of the Complaint.

374. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 374 of the Complaint.

375. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 375 of the Complaint.

376. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 376 of the Complaint.

377. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 377 of the Complaint.

378. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 378 of the Complaint.

379. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 379 of the Complaint.

380. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 380 of the Complaint.

381. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 381 of the Complaint.

382. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 382 of the Complaint.

383. Denies the allegations in Paragraph 383 of the Complaint.

384. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 384 of the Complaint.

385. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 385 of the Complaint.

386. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 386 of the Complaint.

387. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 387 of the Complaint.

388. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 388 of the Complaint.

389. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 389 of the Complaint.

390. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 390 of the Complaint.

391. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 391 of the Complaint.

392. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 392 of the Complaint.

393. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 393 of the Complaint.

394. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 394 of the Complaint.

395. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 395 of the Complaint.

396. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 396 of the Complaint.

397. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 397 of the Complaint.

398. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 398 of the Complaint.

399. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 399 of the Complaint.

400. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 400 of the Complaint.

401. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 401 of the Complaint.

402. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 402 of the Complaint.

403. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 403 of the Complaint.

404. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 404 of the Complaint.

405. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 405 of the Complaint.

406. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 406 of the Complaint.

407. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 407 of the Complaint.

408. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 408 of the Complaint.

409. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 409 of the Complaint.

410. Denies the accuracy of the characterizations alleged in Paragraph 410 of the Complaint.

411. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 411 of the Complaint.

412. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 412 of the Complaint.

413. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 413 of the Complaint.

414. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 414 of the Complaint.

415. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 415 of the Complaint.

416. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 416 of the Complaint.

417. Denies the accuracy of the characterizations alleged in Paragraph of the Complaint.

418. Denies the accuracy of the characterizations alleged in Paragraph of the Complaint.

419. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419 of the Complaint.

420. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 420 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

421. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 421 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

422. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 422 of the Complaint.



423. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 423 of the Complaint.

424. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 424 of the Complaint.

425. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 425 of the Complaint.

426. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 426 of the Complaint.

427. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 427 of the Complaint.

428. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 428 of the Complaint.

429. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 429 of the Complaint.

430. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 430 of the Complaint.

431. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 431 of the Complaint.

432. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 432 of the Complaint.

433. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 433 of the Complaint.

434. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 434 of the Complaint.

435. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 435 of the Complaint.

436. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 436 of the Complaint.

437. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 437 of the Complaint.

438. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 438 of the Complaint.

439. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 439 of the Complaint.

440. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 440 of the Complaint.

441. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 441 of the Complaint.

442. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 442 of the Complaint.

443. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 443 of the Complaint.

444. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 444 of the Complaint.

445. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 445 of the Complaint.

446. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph o446 f the Complaint.

447. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 447 of the Complaint.

448. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 448 of the Complaint.

449. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 449 of the Complaint.

450. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 450 of the Complaint.

451. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 451 of the Complaint.

452. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 452 of the Complaint.

453. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 453 of the Complaint.

454. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 454 of the Complaint.

455. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 455 of the Complaint.

456. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 456 of the Complaint.

457. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 457 of the Complaint.

458. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 458 of the Complaint.

459. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 459 of the Complaint.

460. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 460 of the Complaint.

461. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 461 of the Complaint.

462. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 462 of the Complaint.

463. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 463 of the Complaint.

464. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 464 of the Complaint.

465. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 465 of the Complaint.

466. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 466 of the Complaint.

467. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 467 of the Complaint.

468. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 468 of the Complaint.

469. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 469 of the Complaint.

470. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 470 of the Complaint.

471. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 471 of the Complaint.

472. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 472 of the Complaint.

473. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 473 of the Complaint.

474. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474 of the Complaint.

475. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of the Complaint.

476. Denies the accuracy of the characterizations alleged in Paragraph 476 of the Complaint.

477. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 477 of the Complaint.

478. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 478 of the Complaint.

479. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 479 of the Complaint.

480. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 480 of the Complaint.

481. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 481 of the Complaint.

482. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 482 of the Complaint.

483. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 483 of the Complaint.

484. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 484 of the Complaint.

485. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 485 of the Complaint.

486. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 486 of the Complaint.

487. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 487 of the Complaint.

488. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 488 of the Complaint.

489. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 489 of the Complaint.

490. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 490 of the Complaint.

491. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 491 of the Complaint.

492. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 492 of the Complaint.

493. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 493 of the Complaint.

494. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 494 of the Complaint.

495. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 495 of the Complaint.

496. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 496 of the Complaint.

497. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 497 of the Complaint.

498. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 498 of the Complaint.

499. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 499 of the Complaint.

500. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 500 of the Complaint.

501. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 501 of the Complaint.

502. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 502 of the Complaint.

503. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 503 of the Complaint.

504. Denies the accuracy of the characterizations alleged in Paragraph 504 of the Complaint.

505. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 505 of the Complaint.

506. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 506 of the Complaint.

507. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 507 of the Complaint.

508. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 508 of the Complaint.

509. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 509 of the Complaint.

510. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 510 of the Complaint.



511. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 511 of the Complaint.

512. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 512 of the Complaint.

513. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of 513 the Complaint.

514. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 514 of the Complaint.

515. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 515 of the Complaint.

516. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 516 of the Complaint.

517. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 517 of the Complaint.

518. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 518 of the Complaint.

519. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 519 of the Complaint.

520. Denies the accuracy of the characterizations alleged in Paragraph 520 of the Complaint.

521. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 521 of the Complaint.

522. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 522 of the Complaint.

523. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 523 of the Complaint.

524. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 524 of the Complaint.

525. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 525 of the Complaint.

526. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 526 of the Complaint.

527. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 527 of the Complaint.

528. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 528 of the Complaint.

529. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 529 of the Complaint.

530. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 530 of the Complaint.

531. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 531 of the Complaint.

532. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 532 of the Complaint.

533. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 533 of the Complaint.

534. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 534 of the Complaint.

535. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 535 of the Complaint.

536. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 536 of the Complaint.

537. Denies the accuracy of the characterizations alleged in Paragraph 537 of the Complaint.

538. **Eddie Fields** was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

539. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

540. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

541. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

542. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

543. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

544. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

545. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

546. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

547. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

548. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

549. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

550. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

551. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

552. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

553. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

554. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

555. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

556. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

557. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

558. Eddie Fields was voluntarily dismissed from this case as a Plaintiff on December 6, 2021 (Dkt. No. 325). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

559. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 559 of the Complaint.

560. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 560 of the Complaint.

561. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 561 of the Complaint.

562. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 562 of the Complaint.

563. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 563 of the Complaint.

564. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 564 of the Complaint.

565. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 565 of the Complaint.

566. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 566 of the Complaint.

567. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 567 of the Complaint.

568. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 568 of the Complaint.

569. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 569 of the Complaint.

570. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 570 of the Complaint.

571. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 571 of the Complaint.

572. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 572 of the Complaint.

573. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 573 of the Complaint.

574. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 574 of the Complaint.

575. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 575 of the Complaint.

576. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 576 of the Complaint.

577. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 577 of the Complaint.

578. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 578 of the Complaint.

579. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 579 of the Complaint.

580. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 580 of the Complaint.

581. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 581 of the Complaint.

582. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 582 of the Complaint.

583. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 583 of the Complaint.

584. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 584 of the Complaint.

585. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 585 of the Complaint.

586. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 586 of the Complaint.

587. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 587 of the Complaint.



588. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 588 of the Complaint.

589. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 589 of the Complaint.

590. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 590 of the Complaint.

591. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 591 of the Complaint.

592. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 592 of the Complaint.

593. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 593 of the Complaint.

594. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of the Complaint.

595. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of the Complaint.

596. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 596 of the Complaint.

597. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 597 of the Complaint.

598. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 598 of the Complaint.

599. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 599 of the Complaint.

600. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 600 of the Complaint.

601. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 601 of the Complaint.

602. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 602 of the Complaint.

603. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 603 of the Complaint.

604. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 604 of the Complaint.

605. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 605 of the Complaint.

606. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 606 of the Complaint.

607. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 607 of the Complaint.

608. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 608 of the Complaint.

609. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 609 of the Complaint.

610. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 610 of the Complaint.

611. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 611 of the Complaint.

612. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 612 of the Complaint.

613. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 613 of the Complaint.

614. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 614 of the Complaint.

615. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 615 of the Complaint.

616. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 616 of the Complaint.

617. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 617 of the Complaint.

618. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 618 of the Complaint.

619. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 619 of the Complaint.

620. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 620 of the Complaint.

621. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 621 of the Complaint.

622. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 622 of the Complaint.

623. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 623 of the Complaint.

624. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 624 of the Complaint.

625. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 625 of the Complaint.

626. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 626 of the Complaint.

627. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 627 of the Complaint.

628. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 628 of the Complaint.

629. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 629 of the Complaint.

630. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 630 of the Complaint.

631. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 631 of the Complaint.

632. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 632 of the Complaint.

633. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 633 of the Complaint.

634. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 634 of the Complaint.

635. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 635 of the Complaint.

636. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 636 of the Complaint.

637. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 637 of the Complaint.

638. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 638 of the Complaint.

639. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 639 of the Complaint.

640. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 640 of the Complaint.

641. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 641 of the Complaint.

642. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 642 of the Complaint.

643. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 643 of the Complaint.

644. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 644 of the Complaint.

645. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 645 of the Complaint.

646. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 646 of the Complaint.

647. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 647 of the Complaint.

648. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 648 of the Complaint.

649. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 649 of the Complaint.

650. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650 of the Complaint.

651. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 651 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

652. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 652 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

653. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 653 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

654. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 654 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

655. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 655 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

656. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 656 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

657. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 657 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

658. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 658 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

659. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 659 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

660. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 660 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

661. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 661 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

662. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 662 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

663. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 663 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

664. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 665 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

665. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 665 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

666. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 666 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.



667. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 667 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

668. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 668 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

669. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 669 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

670. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 670 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

671. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 671 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

672. Denies the accuracy of the characterizations alleged in Paragraph 672 of the Complaint.

673. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 672 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

674. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 674 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

675. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 675 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

676. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 676 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

677. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 677 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

678. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 678 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

679. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 679 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

680. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 680 of the Complaint.

681. Denies the allegations in Paragraph 681 of the Complaint.

682. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 682 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

683. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 683 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

684. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 684 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

685. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 685 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

686. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 686 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

687. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 687 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

688. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 688 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

689. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 689 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

690. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 690 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

691. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 691 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

692. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 692 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

693. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 693 of the Complaint, and otherwise refer the Court to the referenced medical records for a true and accurate statement of their contents.

694. Denies the allegations in Paragraph 694 of the Complaint.

695. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 695 of the Complaint.

696. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 696 of the Complaint.

697. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 697 of the Complaint.

698. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 698 of the Complaint.

699. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 699 of the Complaint.

700. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

701. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

702. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

703. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

704. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

705. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

706. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

707. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

708. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

709. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

710. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

711. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

712. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

713. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

714. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

715. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

716. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

717. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

718. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

719. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

720. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

721. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

722. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

723. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

724. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

725. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

726. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

727. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.



728. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

729. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

730. Spencer Jackson was voluntarily dismissed from this case as a Plaintiff on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

731. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731 of the Complaint.

732. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 732 of the Complaint.

733. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 733 of the Complaint.

734. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 734 of the Complaint.

735. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 735 of the Complaint.

736. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 736 of the Complaint.

737. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 737 of the Complaint.

738. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 738 of the Complaint.

739. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 739 of the Complaint.

740. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 740 of the Complaint.

741. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 741 of the Complaint.

742. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 742 of the Complaint.

743. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 743 of the Complaint.

744. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 744 of the Complaint.

745. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 745 of the Complaint.

746. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 746 of the Complaint.

747. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 747 of the Complaint.

748. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 748 of the Complaint.

749. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 749 of the Complaint.

750. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 750 of the Complaint.

751. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 751 of the Complaint.

752. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 752 of the Complaint.

753. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 753 of the Complaint.

754. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 754 of the Complaint.

755. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 755 of the Complaint.

756. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 756 of the Complaint.

757. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 757 of the Complaint.

758. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 758 of the Complaint.

759. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 759 of the Complaint.

760. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 760 of the Complaint.

761. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 761 of the Complaint.

762. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 762 of the Complaint.

763. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 763 of the Complaint.

764. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of the Complaint.

765. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 765 of the Complaint.

766. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 766 of the Complaint.

767. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 767 of the Complaint.

768. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 768 of the Complaint.

769. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 769 of the Complaint.

770. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 770 of the Complaint.

771. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 771 of the Complaint.

772. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 772 of the Complaint.

773. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 773 of the Complaint.

774. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 774 of the Complaint.

775. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 775 of the Complaint.

776. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 776 of the Complaint.

777. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 777 of the Complaint.

778. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 778 of the Complaint.

779. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 779 of the Complaint.

780. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 780 of the Complaint.

781. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 781 of the Complaint.

782. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 782 of the Complaint.

783. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 783 of the Complaint.

784. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 784 of the Complaint.

785. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 785 of the Complaint.

786. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 786 of the Complaint.

787. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 787 of the Complaint.

788. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 788 of the Complaint.

789. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 789 of the Complaint.

790. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 790 of the Complaint.

791. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 791 of the Complaint.

792. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 792 of the Complaint.

793. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 793 of the Complaint.

794. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 794 of the Complaint.

795. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 795 of the Complaint.

796. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 796 of the Complaint.

797. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 797 of the Complaint.

798. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 798 of the Complaint.

799. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 799 of the Complaint.

800. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 800 of the Complaint.

801. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 801 of the Complaint.

802. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 802 of the Complaint.

803. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of the Complaint.

804. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of the Complaint.

805. Denies the accuracy of the characterizations alleged in Paragraph 805 of the Complaint.

806. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 806 of the Complaint.

807. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 807 of the Complaint.

808. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 808 of the Complaint.

809. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 809 of the Complaint.

810. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 810 of the Complaint.

811. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 811 of the Complaint.

812. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 812 of the Complaint.

813. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 813 of the Complaint.

814. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 814 of the Complaint.



815. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 815 of the Complaint.

816. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 816 of the Complaint.

817. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 817 of the Complaint.

818. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 818 of the Complaint.

819. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 819 of the Complaint.

820. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 820 of the Complaint.

821. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph of 821 the Complaint.

822. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 822 of the Complaint.

823. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 823 of the Complaint.

824. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 824 of the Complaint.

825. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 825 of the Complaint.

826. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 826 of the Complaint.

827. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 827 of the Complaint.

828. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 828 of the Complaint.

829. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 829 of the Complaint.

830. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 830 of the Complaint.

831. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 831 of the Complaint.

832. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 832 of the Complaint.

833. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 833 of the Complaint.

834. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 834 of the Complaint.

835. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 835 of the Complaint.

836. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 836 of the Complaint.

837. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 837 of the Complaint.

838. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 838 of the Complaint.

839. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 839 of the Complaint.

840. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 840 of the Complaint.

841. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 841 of the Complaint.

842. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 842 of the Complaint.

843. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 843 of the Complaint.

844. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 844 of the Complaint.

845. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 845 of the Complaint.

846. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 846 of the Complaint.

847. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 847 of the Complaint.

848. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 848 of the Complaint.

849. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 849 of the Complaint.

850. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 850 of the Complaint.

851. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 851 of the Complaint.

852. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 852 of the Complaint.

853. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 853 of the Complaint.

854. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 854 of the Complaint.

855. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 855 of the Complaint.

856. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 856 of the Complaint.

857. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 857 of the Complaint.

858. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 858 of the Complaint.

859. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 859 of the Complaint.

860. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 860 of the Complaint.

861. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 861 of the Complaint.

862. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 862 of the Complaint.

863. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 863 of the Complaint.

864. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 864 of the Complaint.

865. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 865 of the Complaint.

866. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 866 of the Complaint.

867. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 867 of the Complaint.

868. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 868 of the Complaint.

869. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 869 of the Complaint.

870. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 870 of the Complaint.

871. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 871 of the Complaint.

872. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 872 of the Complaint.

873. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 873 of the Complaint.

874. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 874 of the Complaint.

875. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 875 of the Complaint.

876. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 876 of the Complaint.

877. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 877 of the Complaint.

878. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 878 of the Complaint.

879. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 879 of the Complaint.

880. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 880 of the Complaint.

881. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 881 of the Complaint.

882. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 882 of the Complaint.

883. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 883 of the Complaint.

884. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 884 of the Complaint.

885. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 885 of the Complaint.

886. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 886 of the Complaint.

887. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 887 of the Complaint.

888. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 888 of the Complaint.

889. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 889 of the Complaint.

890. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 890 of the Complaint.

891. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 891 of the Complaint.

892. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 892 of the Complaint.

893. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 893 of the Complaint.

894. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 894 of the Complaint.

895. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 895 of the Complaint.

896. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 896 of the Complaint.

897. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 897 of the Complaint.

898. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 898 of the Complaint.

899. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 899 of the Complaint.

900. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 900 of the Complaint.

901. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 901 of the Complaint.

902. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 902 of the Complaint.



903. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 903 of the Complaint.

904. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 904 of the Complaint.

905. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 905 of the Complaint.

906. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 906 of the Complaint.

907. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 907 of the Complaint.

908. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 908 of the Complaint.

909. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 909 of the Complaint.

910. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 910 of the Complaint.

911. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 911 of the Complaint.

912. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 912 of the Complaint.

913. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 913 of the Complaint.

914. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 914 of the Complaint.

915. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 915 of the Complaint.

916. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 916 of the Complaint.

917. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 917 of the Complaint.

918. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 918 of the Complaint.

919. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 919 of the Complaint.

920. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 920 of the Complaint.

921. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 921 of the Complaint.

922. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 922 of the Complaint.

923. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 923 of the Complaint.

924. Denies the accuracy of the characterizations alleged in Paragraph 924 of the Complaint.

925. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 925 of the Complaint.

926. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 926 of the Complaint.

927. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 927 of the Complaint.

928. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 928 of the Complaint.

929. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 929 of the Complaint.

930. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 930 of the Complaint.

931. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 931 of the Complaint.

932. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 932 of the Complaint.

933. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 933 of the Complaint.

934. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 934 of the Complaint.

935. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 935 of the Complaint.

936. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 936 of the Complaint.

937. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 937 of the Complaint.

938. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 938 of the Complaint.

939. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 939 of the Complaint.

940. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 940 of the Complaint.

941. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 941 of the Complaint.

942. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 942 of the Complaint.

943. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 943 of the Complaint.

944. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 944 of the Complaint.

945. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 945 of the Complaint.

946. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 946 of the Complaint.

947. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 947 of the Complaint.

948. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 948 of the Complaint.

949. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 949 of the Complaint.

950. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 950 of the Complaint.

951. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 951 of the Complaint.

952. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 952 of the Complaint.

953. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 953 of the Complaint.

954. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 954 of the Complaint.

955. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 955 of the Complaint.

956. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 956 of the Complaint.

957. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 957 of the Complaint.

958. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 958 of the Complaint.

959. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 959 of the Complaint.

960. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 960 of the Complaint.

961. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 961 of the Complaint.

962. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 962 of the Complaint.

963. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 963 of the Complaint.

964. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 964 of the Complaint.

965. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 965 of the Complaint.

966. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 966 of the Complaint.

967. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 967 of the Complaint.

968. Denies the allegations in Paragraph 968 of the Complaint.

969. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 969 of the Complaint.

970. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 970 of the Complaint.

971. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 971 of the Complaint.

972. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 972 of the Complaint.

973. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 973 of the Complaint.

974. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 974 of the Complaint.

975. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 975 of the Complaint.

976. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 976 of the Complaint.

977. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 977 of the Complaint.

978. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 978 of the Complaint.

979. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 979 of the Complaint.

980. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 980 of the Complaint.

981. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 981 of the Complaint.

982. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

983. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

984. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

985. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

986. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

987. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

988. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.



989. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

990. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

991. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

992. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

993. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

994. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

995. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

996. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

997. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

998. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

999. Michael Vattiato was voluntarily dismissed as a Plaintiff in this case on November 8, 2021 (Dkt. No. 319). No response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

1000. Denies knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1000 of the Complaint.

1001. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1001 of the Complaint.

1002. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1002 of the Complaint.

1003. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1003 of the Complaint.

1004. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1004 of the Complaint.

1005. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1005 of the Complaint.

1006. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1006 of the Complaint.

1007. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1007 of the Complaint.

1008. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1008 of the Complaint.

1009. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1009 of the Complaint.

1010. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1010 of the Complaint.

1011. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1011 of the Complaint.

1012. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1012 of the Complaint.

1013. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1013 of the Complaint.

1014. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1014 of the Complaint.

1015. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1015 of the Complaint.

1016. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1016 of the Complaint.

1017. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1017 of the Complaint.

1018. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1018 of the Complaint.

1019. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1019 of the Complaint.

1020. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1020 of the Complaint.

1021. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1021 of the Complaint.

1022. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1022 of the Complaint.

1023. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1023 of the Complaint.

1024. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1024 of the Complaint.

1025. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1025 of the Complaint.

1026. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1026 of the Complaint.

1027. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1027 of the Complaint.

1028. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1028 of the Complaint.

1029. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1029 of the Complaint.

**The Purported Plaintiff Class Members**

1030. Paragraph 1030 of the Complaint contains a legal conclusion to which no response is required. To the extent a response is required, Dr. Moores denies any allegations of wrongdoing.

1031. Denies the allegations in Paragraph 1031 of the Complaint.

1032. Denies the allegations in Paragraph 1032 of the Complaint.

1033. Denies the allegations in Paragraph 1033 of the Complaint.

1034. Denies the allegations in Paragraph 1034 of the Complaint.

1035. Denies the allegations in Paragraph 1035 of the Complaint.

1036. Denies the allegations in Paragraph 1036 of the Complaint.

1037. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1037 of the Complaint.

1038. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1038 of the Complaint.

1039. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1039 of the Complaint.

1040. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1040 of the Complaint.

1041. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1041 of the Complaint.

1042. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1042 of the Complaint.

1043. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1043 of the Complaint.

1044. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1044 of the Complaint.

**FIRST CLAIM FOR RELIEF**

1045. Dr. Moores repeats her responses to Paragraphs 1-1044 as it fully set forth herein.

1046. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1046 of the Complaint.

1047. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1047 of the Complaint.

1048. Denies the allegations in Paragraph 1048 of the Complaint. To the extent that the allegations in Paragraph 1048 set forth legal conclusions, no response is required. To the extent a response is required, Dr. Moores denies all allegations of wrongdoing.

1049. Denies the allegations in Paragraph 1049 of the Complaint.

1050. Denies the allegations in Paragraph 1050 of the Complaint.

1051. Denies the allegations in Paragraph 1051 of the Complaint.

1052. Denies the allegations in Paragraph 1052 of the Complaint.

1053. Denies the allegations in Paragraph 1053 of the Complaint.

1054. Denies the allegations in Paragraph 1054 of the Complaint.

**SECOND CLAIM FOR RELIEF**

1055. Dr. Moores repeats the foregoing paragraphs as if the same were fully set forth herein.

1056. Denies the accuracy of the characterizations alleged in Paragraph 1056 of the Complaint.

1057. Denies the accuracy of the characterizations alleged in Paragraph 1057 of the Complaint.

1058. Denies the accuracy of the characterizations alleged in Paragraph 1058 of the Complaint.

1059. Denies the accuracy of the characterizations alleged in Paragraph 1059 of the Complaint.

1060. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1060 of the Complaint.

1061. Denies knowledge or information sufficient to form a belief as to truth of the allegations in Paragraph 1061 of the Complaint.

1062. Denies the accuracy of the characterizations alleged in Paragraph 1062 of the Complaint.

1063. Denies the accuracy of the characterizations alleged in Paragraph 1063 of the Complaint.

1064. Denies the accuracy of the characterizations alleged in Paragraph 1064 of the Complaint.

1065. Denies the accuracy of the characterizations alleged in Paragraph 1065 of the Complaint.

1066. Denies the accuracy of the characterizations alleged in Paragraph 1066 of the Complaint.

1067. Denies the accuracy of the characterizations alleged in Paragraph 1067 of the Complaint.

**PRAYERS FOR RELIEF**

1105.<sup>1</sup> Denies that Plaintiffs are entitled to the relief sought in Paragraph 1105 of the Complaint.

1106. Denies that Plaintiffs are entitled to the relief sought in Paragraph 1106 of the Complaint.

1107. Denies that Plaintiffs are entitled to the relief sought in Paragraph 1107 of the Complaint.

1108. Denies that Plaintiffs are entitled to the relief sought in Paragraph 1108 of the Complaint.

1109. Denies that Plaintiffs are entitled to the relief sought in Paragraph 1109 of the Complaint.

1110. Denies that Plaintiffs are entitled to the relief sought in Paragraph 1110 of the Complaint.

1111. Denies that Plaintiffs are entitled to the relief sought in Paragraph 1111 of the Complaint.

1112. Denies that Plaintiffs are entitled to the relief sought in Paragraph 1112 of the Complaint.

---

<sup>1</sup> Paragraphs 1068-1104 appear to be omitted in the Complaint. The numbered paragraphs in this Answer reflect the numbering in the Complaint.



1113. Denies all allegations in the Complaint not specifically admitted or denied in the individual paragraphs above.

## **DEFENSES**

### **FIRST AFFIRMATIVE DEFENSE**

Plaintiffs fail to state a claim for which relief can be granted.

### **SECOND AFFIRMATIVE DEFENSE**

Dr. Moores is entitled to Qualified Immunity.

### **THIRD AFFIRMATIVE DEFENSE**

Dr. Moores is not personally responsible for, or involved in, any acts of commission or omission alleged by Plaintiffs, and is therefore not liable under 42 U.S.C. § 1983.

### **FOURTH AFFIRMATIVE DEFENSE**

At no time did Dr. Moores act willfully or with malicious disregard of Plaintiffs' constitutional rights; plaintiffs, therefore, are not entitled to punitive damages or any other relief against them.

### **FIFTH AFFIRMATIVE DEFENSE**

The injuries allegedly sustained by the Plaintiffs were caused in whole, or in part, by the conduct of one or more parties or entities for whose conduct Dr. Moores is not responsible for.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims may be barred, in whole or in part, by the applicable Statute of Limitations.

### **SEVENTH AFFIRMATIVE DEFENSE**

On information and belief, some Plaintiffs may have failed to exhaust administrative remedies or have failed to satisfy statutory prerequisites for bringing claims.

#### **EIGHTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims may be barred, in whole or in part, by the doctrines of res judicata and collateral estoppel.

#### **NINTH AFFIRMATIVE DEFENSE**

Any injuries or damages alleged were caused, in whole or in part, by Plaintiffs' own culpable or negligent conduct.

#### **TENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by the Eleventh Amendment and the doctrine of Sovereign Immunity.

#### **ELEVENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims may be barred, in whole or in part, by failing to mitigate damages.

#### **TWELFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, because the Southern District of New York is an improper venue.

#### **THIRTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, because the MWAP Policy and practices were rescinded and replaced with Health Services Policy 1.24A, making plaintiffs' claims moot.

#### **FOURTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims do not establish an ongoing deprivation of constitutional rights because the allegations do not establish any custom, policy, or practice which may have caused such deprivations beyond the rescission of the MWAP Policy.

#### **FIFTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims may be barred, in whole or in part, for lack of causation under 42 U.S.C. §1983.

#### **SIXTEENTH AFFIRMATIVE DEFENSE**

Any alleged conduct on the part of Dr. Moores was properly within the discretionary authority committed to her to perform in her official capacity and in her official function and the relief prayed for would constitute an improper intrusion into said authority.

#### **RESERVATION OF RIGHTS**

Dr. Moores reserves the right to amend this Answer and Defenses, including her responses to the allegations in the Second Amended Complaint, and to add any additional defenses as they become known through discovery.

#### **CONCLUSION**

**WHEREFORE**, Dr. Moores respectfully requests that this Court dismiss the Second Amended Complaint and Supplemental Class Action Complaint in its entirety as against her and grant such further relief as the Court deems just and proper.

Dated: January 23, 2023  
Albany, New York

WHITEMAN OSTERMAN & HANNA LLP

BY: s/Oriana Kiley

Oriana L. Kiley, Esq.  
*Attorney for Defendant Dr. Carol A. Moores*  
One Commerce Plaza  
Albany, New York 12260  
Telephone: (518) 487-7728  
okiley@woh.com